



IN THE 1A DISTRICT COURT OF TYLER COUNTY
STATE OF TEXAS

FILED FOR RECORD
2022 FEB 25 A 11:03
Debra H. [Signature]

THE STATE OF TEXAS
VS.
NETFLIX, INC.
100 WINCHESTER CIRCLE
LOS GATOS, CA 95032, USA

§
§ CAUSE NO. 13,970
§ BOND N/A
D&W

CHARGE: SEXUAL PERFORMANCE BY A CHILD
TEXAS PENAL CODE 43.25(d)

INDICTMENT

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURY for Tyler County, Texas duly selected, impaneled, sworn, charged, and organized as such at the JANUARY term A.D. 2022 of the 1A District Court for said County, upon their oaths present in and to said court at said term that NETFLIX, INC., hereinafter styled Defendant, on or about the 1ST day of OCTOBER A.D. 2020, and before the presentment of this indictment, in the County and State aforesaid, DID THEN AND THERE

intentionally and knowingly promote a performance, namely a motion picture, to wit: Cuties, that included sexual conduct by Esther Gohourou, a child who was then and there younger than eighteen (18) years of age, and the defendant knew the character and content of the motion picture, and the promotion of said motion picture was authorized or recklessly tolerated by a high managerial agent, namely, Wilmot Reed Hastings Jr. or Theodore Anthony Sarandos Jr. acting in behalf of Netflix, Inc. and within the scope of the high managerial agent's office or employment at Netflix, Inc.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Emily Cured

Foreman of the Grand Jury

[Signature]

Witness
R. V. [Signature]